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7 Attorneys for Defendant/Counter-Plaintiff,  
8 KEATING DENTAL ARTS, INC.

9  
10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
12 SOUTHERN DIVISION

13 JAMES R. GLIDEWELL DENTAL  
14 CERAMICS, INC. dba GLIDEWELL  
LABORATORIES,

15 Plaintiff,

16 v.

17 KEATING DENTAL ARTS, INC.

18 Defendant.

19 AND RELATED COUNTERCLAIMS.  
20

) Civil Action No.  
) SACV11-01309-DOC(ANx)

) **DECLARATION OF RUSTIN K.**  
) **MANGUM IN SUPPORT OF**  
) **KEATING DENTAL ARTS,**  
) **INC.'S MOTIONS FOR**  
) **SUMMARY JUDGMENT**

) Date: December 17, 2012  
) Time: 8:30 a.m.  
) Location: Courtroom 9D

) Honorable David O. Carter  
)

1 I, Rustin K. Mangum, hereby declare as follows:

2 I am an associate in the law firm of Knobbe, Martens, Olson & Bear, LLP  
3 which represents Keating Dental Arts (“Keating”) in this matter. I have  
4 personal knowledge of the matters set forth herein. If called upon to testify, I  
5 could and would testify competently to them.

6 **A. Deposition Transcripts Containing Non-Public Testimony**

7 1. Attached as **Exhibit 50** is a true and correct copy of the deposition  
8 transcript of James Shuck, Vice President of Sales and Marketing at Glidewell  
9 Laboratories (“Glidewell”) providing testimony on behalf of Glidewell as a  
10 designated Fed. R. Civ. P. 30(b)(6) designee (“Shuck Deposition”). ***This***  
11 ***transcript contains information that Glidewell has designated as Attorney’s***  
12 ***Eyes Only.***

13 2. Attached as **Exhibit 51** is a true and correct copy of the deposition  
14 transcript of Robin Carden, Vice President of Research & Development,  
15 providing testimony as a fact witness (“Carden Deposition”). ***This transcript***  
16 ***contains information that Glidewell has designated as Attorney’s Eyes Only.***

17 3. Attached as **Exhibit 52** is a true and correct copy of the deposition  
18 transcript of Wolfgang Friebauer, Director of Research & Development at  
19 Glidewell, providing testimony as a fact witness (“Friebauer Deposition”). ***This***  
20 ***transcript contains information Glidewell has designated as Attorney’s Eyes***  
21 ***Only.***

22 4. Attached as **Exhibit 53** is a true and correct copy of the deposition  
23 transcript of Robert Brandon, General Manager at Keating, providing testimony  
24 as a fact witness. ***This transcript contains information that Keating has***  
25 ***designated as Attorney’s Eyes Only.***

26 5. Attached as **Exhibit 54** is a true and correct copy of excerpts of the  
27 deposition transcript of Shaun Keating, President and Chief Executive Officer at  
28 Keating, providing testimony as a fact witness. ***This transcript contains***

1 *information that Keating has designated as Attorney's Eyes Only.*

2 **B. Business Documents Containing Non-Public Information**

3 6. Attached as **Exhibit 55** is a true and correct copy of Deposition  
4 Exhibit 508 as marked during the Brandon Deposition. *This document*  
5 *contains information that Keating has designated as Attorney's Eyes Only.*

6 7. **Exhibit 56** is a true and correct copy of the native Excel file from  
7 which Deposition Exhibit 508 was created. The native file (Exhibit 56) is being  
8 lodged with the Court concurrently with this declaration. (See Notice of  
9 Lodging.) *This native file contains information that Keating has designated*  
10 *as Attorney's Eyes Only.*

11 8. Attached as **Exhibit 57** is a true and correct copy of Deposition  
12 Exhibit 509 as marked during the Brandon Deposition. *This document*  
13 *contains information that Keating has designated as Attorney's Eyes Only.*

14 9. **Exhibit 58** is a true and correct copy of the native Excel file from  
15 which Deposition Exhibit 509 was created. The native file (Exhibit 58) is being  
16 lodged with the Court concurrently with this declaration. (See Notice of  
17 Lodging.) *This document contains information that Keating has designated*  
18 *as Attorney's Eyes Only.*

19 10. Attached as **Exhibit 59** is a true and correct copy of Exhibit 510 as  
20 marked during the Brandon Deposition. *This document contains information*  
21 *that Keating has designated as Attorney's Eyes Only.*

22 11. Attached as **Exhibit 60** is a true and correct copy of Exhibit 511 as  
23 marked during the Brandon Deposition. *This document contains information*  
24 *that Keating has designated as Attorney's Eyes Only.*

25 12. Attached as **Exhibit 61** is a true and correct copy of documents  
26 produced by Keating in this litigation bearing production numbers KDA-001928  
27 through KDA-002031. Exhibit 61 is an assemblage of prescription order forms  
28 and corresponding internal laboratory processing forms from which Exhibit 60

1 was created as a subset. *This document contains information that Keating has*  
2 *designated as Attorney's Eyes Only.*

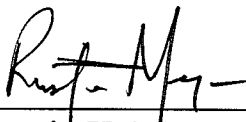
3 13. Attached as **Exhibit 62** is a true and correct copy of Exhibit 512 as  
4 marked during the Brandon Deposition. *This document contains information*  
5 *that Keating has designated as Attorney's Eyes Only.*

6 14. Attached as **Exhibit 63** is a true and correct copy of Deposition  
7 Exhibit 513 as marked during the Brandon Deposition. This document was  
8 produced in this case as a native Excel spread sheet bearing production number  
9 KDA-003526. *This document contains information that Keating has*  
10 *designated as Attorney's Eyes Only.*

11 15. **Exhibit 64** is a true and correct copy of the native file  
12 corresponding to Deposition Exhibit 513. The native file (Exhibit 64) is being  
13 lodged with the Court concurrently with this declaration. *This native file*  
14 *contains information that Keating has designated as Attorney's Eyes Only.*

15 I declare under penalty of perjury under the laws of the United States of  
16 America that the foregoing is true and correct.

17 Executed on November 19, 2012, in Irvine, California.

18  
19   
20 \_\_\_\_\_  
Rustin K. Mangum